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October 4, 2023

Via ECF

The Honorable Paul A. Crotty
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Oct 5, 2023
The requested relief is granted ✓
Woodward
Paul M. Thiele
10/5/23

Re: *United States v. Jose Santiago, et al.*, 23 Cr. 257 (PAC)

Dear Judge Crotty:

As the Court is aware, we represent Mr. Jose Santiago in the above-referenced matter. We write to respectfully request that the Court order Essex County Correctional Facility ("Essex") to provide Mr. Santiago with at least five hours per week of discovery review. ✓

Mr. Santiago has been detained at Essex since May 11, 2023. There are 64 other men housed on Mr. Santiago's unit, and the unit has 3 computers in total—one of which has been inoperative since Mr. Santiago's arrival. Essex is frequently on lockdown due to staffing issues, eliminating the possibility of discovery review entirely. On the rare occasions when the facility is not on lockdown, Mr. Santiago has a maximum of three hours outside of his cell to shower, call his family and access one of the two working computers that 64 others are vying to use.

As is the reality in every case where a defendant is detained pending trial, there are practical and time limitations on Mr. Santiago's access to discovery, but thirty minutes of review every few weeks is simply insufficient. Mr. Santiago needs increased access to his discovery, in order to consult with counsel and meaningfully participate in his defense.

Therefore, we respectfully request that the Court order Essex to provide Mr. Santiago at least five hours per week of discovery review. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Anthony Cecutti, Esq.
Kestine M. Thiele, Esq.